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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, an individual and
ISELA HERNANDEZ, an individual

Plaintiffs,

v.

PRECISION VALVE & AUTOMATION,
Inc., a corporation and DOES 1-20

Defendants.

Case No.: 2:17-cv-03342

Honorable Otis D. Wright II.

**PLAINTIFFS' SUPPLEMENTAL
DISCLOSURES PURSUANT TO
FEDERAL RULES OF CIVIL
PROCEDURE 26(a)(1) and 26(e)1**

1 **Come now Plaintiffs RUBEN JUAREZ, and ISELA HERNANDEZ,**
2 **pursuant to Federal Rule of Civil Procedure §26(a)1 and 26(e)1 make the**
3 **following supplemental disclosures:**

4 **FRCP 26(a)(1)(A)(i) - The name and, if known, the address and telephone**
5 **number of each individual likely to have discoverable information - along with the**
6 **subjects of that information - that the disclosing party may use to support its**
7 **claims or defenses, unless the use would be solely for impeachment.**

8
9 Pursuant to FRCP 26(a)(1)(A)(i), Plaintiffs previously identified the following:

10 **Witnesses:**

- 11 a. Ruben Juarez who may testify as to the liability and damages of the case;
- 12 b. Isela Hernandez who may testify as to the liability and the damages of the
- 13 case;
- 14 c. John Pena of Space X who was Plaintiff's manager may testify as to the
- 15 liability and the damages of the case;
- 16 d. Heather Lord of Space X who was Plaintiff's HR dedicated to Plaintiff's
- 17 case may testify as to the liability and the damages of the case;
- 18 e. Mike Lynch of Space X's HR director who may testify as to the liability
- 19 and the damages of the case;
- 20 f. Jane Malubag of Space X who may testify as to the liability of the case;
- 21 g. Diane Prins of Space X who may testify as to the liability of the case;
- 22 h. Gregory Maxell of Space X who may testify as to the liability of the case;
- 23 i. Steven Schenkel MD of 116 N. Robertson Blvd. #806, Los Angeles, CA
- 24 90048 who may testify as to the liability and the damage of the case;
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1 j. Joseph Chambers, M.D. of Facey who may testify as to the liability and
2 the damages of the case;

3 k. Shendee Teng, MD of Providence Holy Cross Medical Center who may
4 testify as to the liability and the damages of the case;

5 l. Fung-Chuan Ara G. Tilkian MD of Providence Holy Cross Medical Center
6 who may testify as to the liability and the damages of the case;

7 m. Daniel Belayneh MD who may testify as to the liability and the damages
8 of the case

9 n. Albert Ko MD of Facey who may testify as to the liability and the
10 damages of the case;

11 o. Kim Grace MD of Facey who may testify as to the liability and the
12 damages of the case;

13 p. Kevin Vuong, MD of Facey who may testify as to the liability and the
14 damages of the case;

15 q. Herrera-Espinoza Haydee MD of Facey who may testify as to the liability
16 and the damages of the case;

17 r. Tam Te MD of Facey who may testify as to the liability and the damages
18 of the case;

19 s. Palmer MD of Dignity Health Northridge Hospital who may testify as to
20 the liability and the damages of the case;

21 t. DeLa Lama MD of Dignity Health Northridge Hospital who may testify as
22 to the liability and the damages of the case;

1 u. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
2 the damages of the case

3 v. Asma M. Moheet MD of Cedars Sinai who may testify as to the liability
4 and the damages of the case;
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6 w. Michael J. Alexander MD of Cedars Sinai who may testify as to the
7 liability and the damages of the case;

8 x. Ashish D. Patel MD of Cedars Sinai who may testify as to the liability and
9 the damages of the case;

10 y. Penelope G. Kornbluth RN of Cedars Sinai who may testify as to the
11 liability and the damages of the case;

12 z. Omotola E. Johnson MD of Cedars Sinai who may testify as to the liability
13 and the damages of the case;
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15 aa. Michael Alyesh MD of Cedars Sinai who may testify as to the liability and
16 the damages of the case;

17 bb. Karen Altman MD of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 cc. Rachel C. Pearl MD of Cedars Sinai who may testify as to the liability and
20 the damages of the case;

21 dd. Shlee S. Song of Cedars Sinai who may testify as to the liability and the
22 damages of the case;

23 ee. Marcel Maya MD of Cedars Sinai who may testify as to the liability and
24 the damages of the case;
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1 ff. Barry D. Pressman MD of Cedars Sinai who may testify as to the liability
2 and the damages of the case;

3 gg. Shervin Eshaghian, MD of Cedars Sinai who may testify as to the liability
4 and the damages of the case;

5 hh. Ronald Lang, MD of Cedars Sinai who may testify as to the liability and
6 the damages of the case;

7 ii. Jay Jurkowitz MD of Cedars Sinai who may testify as to the liability and
8 the damages of the case;

9 jj. Robert D. Sacks MD of Cedars Sinai who may testify as to the liability
10 and the damages of the case;

11 kk. Mgngnam MD of Digital Health Northridge Hospital who may testify as to
12 the liability and the damages of the case:

13 ll. Susan Kranzpiller MD of Facey who may testify as to the liability and the
14 damages of the case;

15 mm. Chris Aghayan MD of Facey who may testify as to the liability and
16 the damages of the case;

17 nn. Donald Downs MD of Facey who may testify as to the liability and the
18 damages of the case;

19 oo. Ravi Prasad of Cedars Sinai who may testify as to the liability and the
20 damages of the case;

21 pp. Mody Cyrus K. MD of Cedars Sinai who may testify as to the liability and
22 the damages of the case;

1 qq. Robert O. Ruder MD of Cedars Sinai who may testify as to the liability
2 and the damages of the case;

3 rr. Steven Rudd MD of Cedars Sinai who may testify as to the liability and
4 the damages of the case;

5 ss. Mario Salazar Escudero RN of Cedars Sinai who may testify as to the
6 liability and the damages of the case;

7 tt. Elizabeth Homan RN of Cedars Sinai who may testify as to the liability
8 and the damages of the case;

9 uu. Dayle Robson MD of Cedars Sinai who may testify as to the liability and
10 the damages of the case;

11 vv. Bernard Tansman of Cedars Sinai who may testify as to the liability and
12 the damages of the case;

13 ww. James Tourje MD of Cedars Sinai who may testify as to the liability
14 and the damages of the case;

15 xx. Sari M. Cuervo RN of Cedars Sinai who may testify as to the liability and
16 the damages of the case;

17 yy. Gregory Castillo MD of Facey who may testify as to the liability and the
18 damages of the case;

19 zz. David Shaw MD of Facey who may testify as to the liability and the
20 damages of the case;

21 aaa. Anthony J. Loffredo MD of Cedars Sinai who may testify as to the
22 liability and the damages of the case;

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1 bbb. Lindsey Christie RN of Cedars Sinai who may testify as to the
2 liability and the damages of the case;

3 ccc. Menahem Maya MD of Cedars Sinai who may testify as to the
4 liability and the damages of the case;

5 ddd. Lana L Milton MD of Cedars Sinai who may testify as to the
6 liability and the damages of the case;

7 eee. Ronald Andiman MD of Cedars Sinai who may testify as to the
8 liability and the damages of the case;

9 fff. Atul Sharma of Facey who may testify as to the liability and the damages
10 of the case;

11 ggg. Lloyd Wagnes of Facey who may testify as to the liability and the
12 damages of the case;

13 hhh. Zack Rassmussen of Cedars Sinai who may testify as to the liability
14 and the damages of the case;

15 iii. Vahe Mooradian MD of Facey who may testify as to the liability and the
16 damages of the case;

17 jjj. Connie Yi Kim RN of Cedars Sinai who may testify as to the liability and
18 the damages of the case;

19 kkk. Alan J Coe MD of Cedars Sinai who may testify as to the liability
20 and the damages of the case;

21 lll. Madhavi Lekkala MD of Facey who may testify as to the liability and the
22 damages of the case;

1 mmm. Douglas Prisco MD of Facey who may testify as to the liability and
2 the damages of the case;

3 nnn. Rabin Nikjoo MD of PHCMC who may testify as to the liability and
4 the damages of the case;

5 ooo. Carrole Lewis RN of PHCMC who may testify as to the liability and
6 the damages of the case;

7 ppp. Gregory Paranay MD of PHCMC who may testify as to the liability
8 and the damages of the case;

9 qq. Rinka Shiraishi RN of Cedars Sinai who may testify as to the
10 liability and the damages of the case;

11 rrr. Dayle D Robson of Cedars Sinai who may testify as to the liability and the
12 damages of the case;

13 sss. Jaime A Diaz MD of PHCMC who may testify as to the liability and
14 the damages of the case;

15 ttt. Michael Pecoraro RN of PHCMC who may testify as to the liability and
16 the damages of the case;

17 uuu. Nichole K Crouch RN of PHCMC who may testify as to the liability
18 and the damages of the case;

19 vvv. Christopher Hougen MD of Facey who may testify as to the liability
20 and the damages of the case;

21 www. Martin Applebaum of Facey who may testify as to the liability and
22 the damages of the case;

xxx. Magued Beshay MD of Facey who may testify as to the liability and the damages of the case;

yyy. Dharmesh Patel of Facey who may testify as to the liability and the damages of the case;

zzz. David Shaw MD of Facey who may testify as to the liability and the damages of the case;

aaaa. Youssef Youssef MD of Facey who may testify as to the liability and the damages of the case;

bbbb. Kevin Vuong MD of Facey who may testify as to the liability and the damages of the case;

cccc. Meredith R D'Anna RN of PHCMC who may testify as to the liability and the damages of the case;

dddd. Jamie A Diaz MD of PHCMC who may testify as to the liability and the damages of the case;

eeee. Barry Wilen MD of PHCMC who may testify as to the liability and the damages of the case;

ffff. Jong Lee MD of Facey who may testify as to the liability and the damages of the case;

gggg. Daniel Brison MD of Facey who may testify as to the liability and the damages of the case;

hhhh. Colin W Stokol MD of Cedars Sinai who may testify as to the liability and the damages of the case;

1 iii. Defendant's persons most knowledgeable regarding the design and
2 operation of PVA 350;

3 iiii. Defendant's persons most knowledgeable regarding the chemicals
4 that were going to be sprayed by the PVA 350 at issue;
5

6 **Additional prior supplemental disclosures identified the following:**

7 1. **Jose Vasquez**

8 Address: 8922 Nogal Avenue, Whittier, CA.

9 Mr. Vasquez is a former SpaceX electronic technician.

10 2. **Precision Valve & Automation, Inc. ("PVA"):**

11 **Witnesses:** Frank Hart, Sales Manager; Jeff Van Norden, Engineering Manager;
12 Jon Connelly, Rework Sales Manager; Alex Duggan, Project Engineer; Mark Kniese,
13 Controls Engineer; Andrew Haraburda, Customer Service Tech; Michael Leonard,
14 Customer Service Tech; Richard Bievenue; Rex Ellis; Chris Evans; David Filbert;
15 David Gomez; Rodrigo Gutierrez; Gavin Matupang and Jon Urquhart.
16

17 3. **Space Exploration Technologies Corp. ("SpaceX"):**

18 Address and telephone number: 1 Rocket Road, Hawthorne, CA 90250 (310)
19 363-6000.
20

21 **Witnesses:** Francisco whose last name is unknown, Juan whose last name is
22 unknown, Scott Alberta, Jose Bernabe, Edwin Chiu, David DiDomenico, Antonio
23 Figueroa, David Hwang, Heather Lord, Jane Malabug, Art Geitler, Brian Ignaut,
24 Andrea Jarrett, Mike Lynch, Gregory Maxwell, Due Phan, Diane Prins, Adam Protano,
25 John Pena, Pascale Roux, Marsha Thompson, Juan Sotelo, and Nicholas Wong.
26

27 4. **Express Manufacturing, Inc. ("EMI"):**

1 Address and telephone number: 3519 West Warner Avenue, Santa Ana, CA
2 92704, (714) 979-2228.

3 **Witnesses:** Dong Nguyen, Vincent Dones.

4 **5. Restronics Southern California:**

5 Address and telephone number: 27128 Paseo Espada B603, San Juan Capistrano,
6 CA 92675, (949) 394-2720.

7 **Witness:** Bill Bums.

8 **6. Ever Garcia**

9 Mr. Garcia's phone number is (661) 310-6173. Mr. Garcia is the Plaintiff's
10 friend who may testify as to the liability and the damages of the case.

11 **7. Eduardo Soto**

12 Mr. Soto's phone number is (818) 486-1617. Soto is Plaintiff's nephew who
13 may testify as to the liability and the damages of the case.

14 **8. Linda Soto**

15 Ms. Soto's phone number is (818) 205-4934. She is Eduardo Soto's wife.
16 Ms. Soto may testify as to the liability and the damage of the case.

17 **9. Sheila Tai, MD of Facey**

18 Dr. Tai may testify as to the liability and the damages of the case;

19 **10. Batah Jihad, MD of Facey**

20 Dr. Jihad may testify as to the liability and the damages of the case;

21 **11. Navid Eghbalieh, MD of Facey**

22 Dr. Eghbalieh may testify as to the liability and the damages of the case;

23 **12. Doris Cardenas, MD of Facey**

Dr. Dr. Cardenas may testify as to the liability and the damages of the case;

13. **Jackie Swanson, MD of Facey**

Dr. Swanson may testify as to the liability and the damages of the case;

14. **Henry Shih, MD of Providence Holy Cross Medical Center**

Dr. Shih may testify as to the liability and the damages of the case;

15. **Helen Palatinus, MD of Cedar Sinai Medical Center**

Dr. Palatinus may testify as to the liability and the damages of the case;

16. **John Yamashita, MD of Providence Holy Cross Medical Center**

Dr. Yamashita may testify as to the liability and the damages of the case;

17. **Joseph Tang, MD**

Dr. Tang may testify as to the liability and the damages of the case;

18. **Vincent Fennell, MD**

Dr. Fennell may testify as to the liability and the damages of the case;

19. **Grace Juarez, MD**

Dr. Juarez may testify as to the liability and the damages of the case;

20. **Aylin Selek, MD of Cedar Sinai**

Dr. Selek may testify as to the liability and the damages of the case;

21. **Marc Makhani, MD of Cedar Sinai**

Dr. Makhani may testify as to the liability and the damages of the case;

22. **Daniel Hoh Kayun, MD of Cedar Sinai**

Dr. Kayun may testify as to the liability and the damages of the case;

23. **Katherine Haker, MD of Cedar Sinai**

Dr. Haker may testify as to the liability and the damages of the case;

1 **24. Deepti Dhall, MD of Cedar Sinai**

2 Dr. Dhall may testify as to the liability and the damages of the case;

3 **25. Alfonso Jackie, RN of Cedar Sinai**

4 Mr. Jackie may testify as to the liability and the damages of the case;

5 **26. Josue M. Reyes, RN of Cedar Sinai**

6 Ms. Reyes may testify as to the liability and the damages of the case;

7 **27. Lorisa Raya, RN of Cedar Sinai**

8 Ms. Raya may testify as to the liability and the damages of the case;

9 **28. Laura Olivas of Cedar Sinai**

10 Ms. Olivas may testify as to the liability and the damages of the case;

11 **29. Shawn Rudolph, EMT**

12 Mr. Rudolph may testify as to the liability and the damages of the case;

13 **30. Jose Paz, EMT**

14 Mr. Paz may testify as to the liability and the damages of the case;

15 **31. David Alessi**

16 Mr. Alessi may testify as to the liability and the damages of the case.

17 **Plaintiffs have learned by reviewing documents during discovery that the**
18 **following additional witnesses may have information related to Plaintiffs' claims,**
19 **PVA's products, and/or SpaceX.**

20 **1. Christopher Mendoza**

21 Mr. Mendoza may testify as to the liability and the damages of the case.

22 **2. Manuel Gutierrez**

23 Mr. Gutierrez may testify as to the liability and the damages of the case.

1
2 Relevant information regarding this case may also be learned from numerous
3 other PVA and SpaceX employees, PVA retained experts. Plaintiffs have not identified
4 all relevant witnesses regarding this lawsuit including any witnesses PVA may identify
5 in their Rule 26 Disclosures and supplemental disclosures and reserves its right to
6 supplement this disclosure in accordance with Fed. R. Civ. P. Rule 26(e).
7

8 **FRCP 26(a)(1)(A)(ii) - A copy - or a description by category and location – of**
9 **all documents, electronically stored information, and tangible things that the**
10 **disclosing party has in its possession, custody, or control and may use to support**
11 **its claims or defenses, unless the use would be solely for impeachment.**

12 Pursuant to FRCP 26(a)(1)(A)(ii) Plaintiffs have previously identified the
13 following:
14

15 **Documents:**

- 16 a. Plaintiff Ruben Juarez's medical records and billing records
17 b. PVA 350 and PVA 650 specifications;
18 c. MSDS sheets;
19 d. Photos of Plaintiffs;
20 e. Plane tickets and trip protection of Plaintiff Isela Hernandez and their
21 daughter;
22 f. Emails of Plaintiff Ruben Juarez;
23 g. W2 of Plaintiff Ruben Juarez 2012-2014.
24

25 **Plaintiffs previously supplemented disclosures identifying the following**
26 **items.**
27
28

1 Documents produced in discovery by PVA bates stamp numbers PVA0001-
 2 4481. Said production includes, among other documents, product-related documents,
 3 sales-related documents, engineering and design documents, design and operation
 4 manuals, operation and maintenance manuals, emails, and other written and electronic
 5 communications.

6
 7 Documents and recording produced in discovery by SpaceX on June 25, 2018
 8 including documents with bates stamp numbers Juarez v. PVA 1000 – 2170

9 **Plaintiffs have learned by reviewing documents during discovery that the**
 10 **following additional documents may be relevant to Plaintiffs' claims, PVA's**
 11 **products, and/or SpaceX.**

12
 13 Documents produced in discovery by PVA bates stamp numbers PVA4482 to .
 14 Said production includes, among other documents, product-related documents, sales-
 15 related documents, engineering and design documents, design and operation manuals,
 16 operation and maintenance manuals, emails, and other written and electronic
 17 communications.

18
 19 Documents and recording produced in discovery by SpaceX including bates
 20 stamp numbers Juarez v. PVA 2171- 3977.

21 Video of PVA 350

22 Video of PVA 350 Conformal Coating

23 Video of PVA Coating Machine

24 Video of PVA Conformal Coating Process

25 Video of PVA re Conformal Coating

26 Comparison Chart as Posted on pva.net in 2012
 27
 28

1 4 Depositions of Plaintiffs

2 Xylene Exemplar

3 Toxicology Reports of Ruben Juarez

4 Declaration of Jose Vasquez

5 Declaration of Christopher Mendoza

6 Declaration of Manuel Gutierrez

7
8 All documents produced by PVA Inc. and Space X. Also, all documents
9 received pursuant to FOIA requests and subpoena requests.

10 **Damages computation and supporting documents:**

11 a. Plaintiff Ruben Juarez claims past and future medical costs, past and
12 future wage loss, and pain and suffering. Plaintiff Isela Hernandez claims loss of
13 consortium. The supporting documents will be produced.

14
15 Plaintiffs retain the right to supplement the disclosure with information learned
16 through discovery.

17
18 DATED: July 10, 2018

BALABAN & SPIELBERGER, LLP

19
20
21 /s/ Vanessa L. Loftus-Brewer

22 Daniel K. Balaban

23 Andrew J. Spielberger

24 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 14, 2018, a true and correct copy of **PLAINTIFFS' SUPPLEMENTAL DISCLOSURES PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 26(a)(1) and 26(e)1** has been served via ECF upon all counsel of record in the Court's electronic filing system.

By: /s/ Drue Balaban

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LOS ANGELES, CALIFORNIA 90049